

September 9, 1999

USDA/FSIS Hearing Clerk
300 12th Street, SW
102 Cotton Annex
Washington, DC 20250-3700

Re: FSIS Docket #98,045N2.
FDA Docket #98N-1230

Dear Sir or Madam:

To achieve the Food Safety Strategic Planning Task Force goal of a 50% reduction in egg-associated *Salmonella enteritidis* illnesses by 2005, there needs to be a program encouraging the testing of laying flocks and the diversion of eggs produced by SE-positive flocks to breaking/pasteurization.

If such a program were to be put in place there would need to also be a federal reimbursement program whereby the producer would be compensated at a rate of at least 95% of the economic penalty of selling the eggs for breaking/pasteurization. The 5% penalty (95% vs. 100%) would serve as an incentive for the producer to try to convert the premise to flocks with SE-negative status so the eggs could enter the normal table egg market with the associated higher prices. Unfortunately, it can be very difficult to transition a premise from SE-positive to SE-negative status so it may not be readily accomplished, meaning the program may need to be in place for 5 - 10 years.

The diversion of eggs from SE-positive flocks to breaking/pasteurization should significantly reduce the likelihood of any SE-positive eggs entering the shell egg market. This will not likely end the incidence of human illnesses due to *S. enteritidis* but it should quickly reduce the number related to egg consumption.

Sincerely,



C. W. BEARD, D.V.M., Ph.D.
Vice President, Research and Technology
cbeard@poultryegg.org

CWB:jl

**U.S. Poultry & Egg
ASSOCIATION**

1530 Cooledge Road
Tucker, GA 30084-7303, U.S.A.
Telephone: 770/493-9401
Facsimile: 770/493-9257
www.poultryegg.org

Chairman
Bernard Leonard
Springdale, AR

Vice Chairman
Bill Ingram
Cullman, AL

Treasurer
Lawton Wofford
Demorest, GA

Secretary
Ralph Simmons
Nacogdoches, TX

Immediate Past Chairman
Delvin Barrett
Kurten, TX

96P-0418

C818

CROSS FILE SHEET

File Number: 98N-1230/ *C818*

See File Number: 97P-0197/ *C819*
96P-0418/ *C818*